

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS, INC.,)
)
Plaintiff,)
)
v.) Civil Action No. 3:09cv620
)
LAWSON SOFTWARE, INC.)
)
Defendant.)

DEFENDANT LAWSON SOFTWARE, INC.'S MOTION TO COMPEL
ePLUS, INC. TO RESPOND TO INTERROGATORIES 19 AND 20

Lawson Software, Inc. ("Lawson"), pursuant to Fed. R. Civ. P. 37, moves to compel ePlus, Inc. ("ePlus") to provide a complete response to Lawson's Interrogatory Nos. 19 and 20. In particular, Lawson moves the Court to compel ePlus to provide:

(1) for each excerpt of the prior art specifically cited by Lawson in its Supplemental Initial Statement of Invalidity Defenses by page number as disclosing a claim limitation, whether ePlus disputes that the prior art discloses the limitation and, if so, why; and

(2) for each combination of prior art specifically identified by Lawson in its Supplemental Initial Statement of Invalidity Defenses, whether ePlus disagrees that a person of ordinary skill would combine the references and, if so, why.

The grounds for this motion are set forth in Lawson's Memorandum in Support of Motion to Compel, which is filed herewith. Counsel states that a good faith effort has been made between counsel to resolve the discovery matters at issue.

LAWSON SOFTWARE, INC.

By /s/
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Counsel for Defendant Lawson Software, Inc.

CERTIFICATE OF SERVICE

I certify that on this 1st day of March, 2010, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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